

### REMARKS/ARGUMENTS

Claims 1, 10-11, 13-14 and 17 stand rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,538,656 (Cheung) in view of U.S. Patent No. 6,396,473 (Callahan). Applicant respectfully traverses this rejection. With regard to claim 1, the Office Action concedes that “Cheung does not teach adjusting a flicker filter based on the alpha value” as recited by claim 1. Office Action, p. 3. Instead, the Office Action relies on Callahan for such a teaching, stating that “it would have been obvious...to modify the process for blending graphic and video surfaces (Fig. 28) to adapt Callahan’s flicker filter (16).” Office Action, p. 3.

Applicant respectfully disagrees. With respect to Callahan, there is no teaching or suggestion for “adjusting a flicker filter based upon the alpha value” as recited by claim 1. That is, Callahan does not adjust a flicker filter based on an alpha value. Instead, the flicker filter 16 of Callahan merely filters graphics data that is to be overlaid. Callahan, col 5, ll. 30-40. Nowhere does Callahan teach or suggest that the flicker filter is adjusted in any manner, and it clearly does not teach or suggest any such adjustment based on an alpha value. Instead, Callahan merely discloses that an alpha value is used in the conventional manner to blend the contents of a graphics buffer and a video buffer. Callahan, col. 5, ll. 50-65. No other use of an alpha value is taught or suggested by Callahan.

Nor is there any teaching or suggestion in either reference to combine Callahan with Cheung to perform the claimed adjusting of a flicker filter based on an alpha value. In this regard, Applicant respectfully submits that there is no “suggestion in Callahan that incorporating the flicker filter (16) inside Cheung’s blending process of Fig. 28 is functionally equivalent to ‘adjusting a flicker filter based on alpha value’.” Office Action, p. 3. Instead, Applicant respectfully submits that there is no functional equivalent, and neither reference supports this contention of the Office Action. This is clearly the case, as the Office Action provides no support for the alleged “suggestion” in Callahan.

Thus claim 1 patentably distinguishes over the proposed combination. Further, independent claims 10 and 17 and claims 11, 13 and 14 depending therefrom are patentable for the same reasons.

Claims 2-9, 12, 15-16, and 18-22 stand rejected over Cheung in view of Callahan and in further view of U.S. Patent No. 6,144,365 (Young). For the same reasons discussed above with regard to claim 1, this rejection is improper.

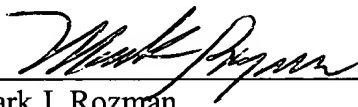
The rejection of claim 2 is further improper, as Young does not teach or suggest comparing an alpha value to a predetermined threshold value. In this regard, Young does not teach or suggest an alpha value that "indicates how a video signal and a graphics signal are to be combined." See claim 1. Instead, the alpha value of Young relates solely to graphics images and the blending of two graphics pixels (and more specifically, colors thereof) as a foreground and background pixel. Young, 1:22-52.

Further, the fact that Young has an alpha blending unit that includes an adder, subtracter, multiplier and divider nowhere teaches or suggests using such components for comparisons with alpha values, threshold values or alpha step values. Nor does Young teach or suggest using its alpha test unit (306), Z compute unit (308) or alpha blending unit (310) to adjust a filter level of a flicker filter. For at least these further reasons, claims 2-9, 12, 15-16, and 18-22 are patentable.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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